

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-mc-00353-LJL

DECLARATION OF JOHN LANGFORD
IN SUPPORT OF PLAINTIFFS' MOTION AND OBJECTION
REGARDING CLAIM OF EXEMPTION AS TO FUNDS HELD AT CITIBANK, N.A.

I, John Langford, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am counsel to Plaintiffs Ruby Freeman and Wandrea' ArShaye Moss ("Plaintiffs") in the above-captioned action.

2. In connection with enforcement proceedings in this action, Plaintiffs served an information subpoena and restraining notice on Citibank, N.A. ("Citi"). A true and correct copy of the information subpoena and restraining notice are attached as Exhibit A.

3. On September 10, 2024, Rudolph W. Giuliani ("Mr. Giuliani"), through his representative Theodore Goodman, caused an Exemption Claim Form pertaining to a Citi account ending in x1428 be served on Plaintiffs' Counsel (the "Citi Exemption Claim Form"). A true and correct copy of the Citi Exemption Claim Form is attached as Exhibit B.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 17, 2024.

s/ John Langford
John Langford
United to Protect Democracy
82 Nassau Street, #601
New York, New York 10038
(202) 579-4582
John.Langford@protectdemocracy.org

*Attorney for Ruby Freeman and
Wandrea' Moss*